

1 DENNIS M. PRINCE
2 Nevada Bar No. 5092
3 KEVIN T. STRONG
4 Nevada Bar No. 12107
5 **PRINCE LAW GROUP**
6 10801 West Charleston Blvd, Suite 560
7 Las Vegas, NV 89135
8 P: (702) 534-7600
9 F: (702) 534-7601
10 Email: eservice@thedplg.com
11 Attorneys for Plaintiff
12 *Renee Jenkins*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 RENEE JENKINS, an Individual,
16 Plaintiff,

17 v.
18 PRIME WASHINGTON, LLC, d/b/a
19 CORNERSTONE CROSSINGS
20 APARTMENTS, a Delaware limited
21 liability company; PRIME
22 ADMINISTRATION, LLC, d/b/a PRIME
23 GROUP, a Delaware limited liability
24 company; PAULETTA DEARINGER, an
25 individual; ROE PROPERTY
26 MANAGEMENT COMPANY; ROE
27 PROPERTY MANAGER; DOES I-X; and
28 ROE BUSINESS ENTITIES XI-XX,
inclusive,

CASE NO.: 2:20-CV-00653-JCM-DJA

**STIPULATION AND
ORDER, FOR EXTENSION OF
TIME TO FILE AN OPPOSITION TO
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT**

(First Request)

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff RENEE JENKINS, through her counsel of record, Dennis M. Prince and Kevin T. Strong of PRINCE LAW GROUP, and Defendants PRIME WASHINGTON, LLC, d/b/a CORNERSTONE CROSSINGS APARTMENTS, PRIME ADMINISTRATION, LLC,



1 d/b/a PRIME GROUP, and PAULETTA DEARINGER, by and through their counsel of
 2 record, Rachel J. Holzer of TYSON & MENDES LLP, that the deadline for Plaintiff to
 3 file her Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint Pursuant to
 4 FRCP 12(b)(6) (ECF No. 6) shall be extended by seven (7) days, from April 27, 2020 to
 5 May 4, 2020. The Motion was filed on April 13, 2020. This is the first stipulation for
 6 extension of time to file Plaintiff's opposition to Defendants' motion. This Stipulation
 7 and [Proposed Order] is submitted in accordance with LR IA 6-1.

8 Good cause exists to grant the parties' stipulation. Specifically, Plaintiff's
 9 counsel, Prince Law Group, filed its notice of association on April 24, 2020. (ECF No.
 10). Prince Law Group will file a Substitution of Counsel once the necessary signatures
 11 are obtained. As Defendants have made clear in their Motion to Dismiss, there are
 12 complex procedural matters that require a complete review of the pleadings and
 13 procedural history in this matter. Plaintiff's counsel requires additional time to review
 14 the record to more fully understand the aforementioned procedural matters and
 15 prepare an appropriate opposition to Defendants' Motion to Dismiss. This additional
 16 time will also provide the Plaintiff more time to fully and properly apprise the Court of
 17 the legal issues in this matter.

18 There are currently no scheduled hearings in this case. A short extension to file
 19 an opposition will not unduly delay the proceedings, nor adversely affect or prejudice
 20 the parties. This request is not being made in bad faith, but to allow Plaintiff's counsel
 21 time to review the pleadings in this case, and other related cases, in order to properly
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1 respond to Defendants' Motion. Therefore, the parties respectfully request this Court
2 to approve the foregoing stipulation.

3 DATED this 24th day of April, 2020.

4 **PRINCE LAW GROUP**

5 /s/ Dennis M. Prince
6 DENNIS M. PRINCE
7 Nevada Bar No. 5092
8 KEVIN T. STRONG
9 Nevada Bar No. 12107
10 10801 W. Charleston Boulevard, Suite 560
Las Vegas, Nevada 89135
11 Attorneys for Plaintiff

DATED this 24th day of April, 2020

TYSON & MENDES, LLP

/s/ Rachel J. Holzer
RACHEL J. HOLZER
Nevada Bar No. 11604
3960 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
12 Attorneys for Defendants

ORDER

13 **IT IS SO ORDERED.**

14 DATED April 27, 2020.

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16 Lewis C. Mahan
17 UNITED STATES DISTRICT JUDGE

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